

## **Section 38**

### ***Safety and Occupational Health Program Evaluations***

#### **38.1 Scope**

This section specifies the minimum requirements and procedures for conducting safety and occupational health (SOH) Program Evaluations (PEs). This section ensures alignment with the requirements established in Departmental Manual 485, Chapter 5, *Program Evaluations* and Federal Occupational Safety and Health Administration (OSHA) Standard 29 CFR 1960.79, *Evaluation of Federal Occupational Safety and Health Programs*.

#### **38.2 General Requirements**

Senior SOH professionals at the regional and Bureau level will conduct SOH PEs. SOH PEs will be conducted in a collaborative manner between the local SOH professional and local management officials. SOH PEs affirm the presence of effective SOH programs. SOH PEs are programmatic reviews and are not intended as compliance inspections or facility inspections. SOH PEs comprise one part of overarching SOH programmatic internal control requirements and examine program integration, culture, and effectiveness.

#### **38.3 Responsibilities**

##### **38.3.1 Chief, Reclamation Safety and Occupational Health Office**

**38.3.1.1** Shall develop and administer the SOH PE program.

**38.3.1.2** Shall conduct SOH PEs on each regional SOH program once every 3 years.

##### **38.3.2 Reclamation Safety Council**

**38.3.2.1** Shall review the SOH PE program annually to ensure it meets the needs of the organization while adhering to governing Departmental requirements and Federal OSHA Standards.

##### **38.3.3 Regional Safety Manager**

**38.3.3.1** Shall implement the SOH PE program in the region.

**38.3.3.2** Shall conduct SOH PEs for each area and field office at least once every 3 years.

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### **38.3.4 Regional/Area Office Program Coordinators, Safety Professionals and Collateral Duty Safety Representatives**

**38.3.4.1** Shall actively participate in, and support, the SOH PE program.

## **38.4 SOH Program Evaluation Process**

### **38.4.1 Pre-Coordination and Communication**

**38.4.1.1 Schedule.** The SOH official conducting the PE shall verify the start date of the PE 3 months in advance.

**38.4.1.2 Safety Evaluation (SAFE) Questions Selection.** The regional or area SOH office being evaluated shall work collaboratively with their local managers to select questions from the SAFE checklist they feel would provide the most value to their local unit during the PE. The SAFE checklist questions selected by the regional/area offices fulfill the Departmental requirements for conducting SOH PEs.

**38.4.1.3 SAFE Question Agreement.** The SOH official conducting the PE and the regional or area SOH office being evaluated shall agree upon the SAFE checklist questions to be assessed during the PE 2 months prior to the scheduled evaluation date.

**38.4.1.4 SAFE Tool.** The SOH official conducting the PE shall update the SAFE Tool for use during the SOH PE with the questions that have been selected.

**38.4.1.5 SAFE Completion.** The regional or area SOH office being evaluated shall complete the SAFE Tool and provide the completed SAFE Tool to the SOH official conducting the PE at least 2 weeks prior to the start of the PE.

**38.4.1.6 Documentation Submittal.** The regional or area SOH office being evaluated shall provide to the SOH official conducting the PE documentation verifying the status of the SOH program at least 2 weeks prior to the start of the PE.

### **38.4.2 Conducting the SOH Program Evaluation**

**38.4.2.1 In-Person.** The SOH official shall conduct SOH PEs in person.

**38.4.2.2 In-Brief.** The SOH official conducting the PE shall conduct an informal in-brief with local senior officials, SOH professionals, and whomever else local senior officials feel should be invited, such as supervisors, managers, and labor representatives.

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**38.4.2.3 Process Overview.**

During the in-brief, the SOH official conducting the PE shall discuss the intent of the PE and the process used to conduct the PE.

**38.4.2.4 Site Visits.** The SOH official conducting the PE shall visit sites or offices appropriate to validate the current status of those program areas that will be evaluated based upon the criteria selected from the SAFE Tool.

**38.4.2.5 Close-out Briefing.** At the conclusion of the PE, the SOH official conducting the PE shall conduct a close-out briefing with the local senior officials, SOH professionals, and whomever else the local senior official feels should be invited, such as supervisors, managers, and labor representatives.

**38.4.3 Program Evaluation Report**

**38.4.3.1 Written Report.** The written report shall include the following:

- An introductory paragraph indicating who conducted the PE, the dates the PE was conducted, and the regional or area SOH office evaluated.
- A paragraph that outlines current SOH strengths identified during the PE that should be continued.
- A paragraph that outlines opportunities for improvement that, if acted upon by local leadership, would benefit the local SOH program and mitigate risk exposure to employees.

**38.4.3.2 SAFE Tool.** The SOH official shall attach a copy of the SAFE Tool report, including the selected questions, responses, and dashboard, to the written report.

**38.4.3.3 Draft Review.** The SOH official shall share a draft of the PE report with the senior official and SOH office that was evaluated for review to ensure there is concurrence and understanding regarding the content of the report. The draft report will include findings and recommendations. The evaluated unit will provide a written response to each recommendation notating concurrence, partial concurrence, or no concurrence.

**38.4.3.4 Final Report.** The SOH official will address the final SOH PE report to the regional director, area office manager, or field office manager relative to the level of review.

**38.4.3.5 Report Sharing.** The local senior official of the unit evaluated shall consider sharing the final PE report with local employees and with their senior rating official. For example, area managers may share a copy of the report with the regional

director. Regional directors may share a copy with the Deputy Commissioner for Operations.

### **38.5 Definitions in Appendix K and References in Appendix L**